

Response to Comments Table Water Resources (8-24-09)

Page #, Ref.	Commenter	Comment	Response
General	NCAC	The chapter should address demand.	See policies and IS's under Goal 4 for demand reduction policies.
General	NCAC	This chapter needs stronger implementation and cooperation between agencies.	Collaborative and cooperative policies appear though out the chapter. (See 1.4, 1.5, 1.10, 1.15, 3.4, 3.6, 4.1, 4.3, 4.4, 5.1, 5.3, 5.4, 5.5).
General	NCAC	Use efficiency instead of conservation.	Both concepts are addressed in the chapter.
General	B.K. Richards	Policies address demand; is there a demand model.	Modeling is beyond the document's intent. Master Water Plan will address the issue.
General	NCAC	Why "especially Ag land uses" in regard to securing adequate water supply.	Agricultural water supplies receive protection under existing general plan policies (see AG Policy 11).
General	NCAC	In regard to strategic growth and protecting groundwater, a one size fits all policy may be inappropriate.	Water policies are developed to fit the circumstances (e.g. need for groundwater monitoring, reporting).
General	NCAC Community	Need policy on contamination from mercury mines.	Mercury contamination is addressed at the federal level.
General	Sierra Club	Suggest: <u>Goal WR 7 Permanent funding for adequate ground water monitoring shall be secured by the end of 2009.</u>	Budgeting for implementation is a Board of Supervisor prerogative and is addressed through COSE-1 on page 1.22.
General	Sierra Club	Suggest: <u>Goal WR 8 A countywide groundwater ordinance to govern groundwater in areas of the county not currently under adjudication shall be adopted in 2010.</u>	Groundwater ordinance is addressed in IS 2.1.2
General	Sierra Club	Suggest: <u>Goal WR 9 Right of access to all wells and permission to report on wells shall be secured by the end of 2011.</u>	Access to well data is addressed in IS 2.2.3
General	Sierra Club	Suggest: <u>Goal WR 10 A LID ordinance shall be in place by 2011.</u>	LID is being addressed currently and will likely result in amendments to Title 19 and 22.
General	HBA	Goals and policies should address limits on irrigation and only drought resistant landscaping.	Policies and IS under Goal 4 address water conservation including use of water for landscaping (see especially IS 4.1.2 and 4.1.3)
General	HBA	COSE should encourage development of multiple supplemental water sources.	The policies under Goal 1 seek to widen water sources (see Policies 1.3, 1.4, 1.5 and 1.15).
General	LOCAC	Policy statements should include a verb.	Policies generally start with a verb (i.e. require, promote, encourage, collaborate).
Intro 10.2	B.K. Richards	Issues not framed as issues.	Issues are adequately framed as is.
10.4 Intro	LOCAC	Why can't the County be more proactive and be a leader in coordinating water conservation.	In spite of limited authority, the COSE calls for more County leadership (see Policies through out Chapter 10).
10.5 Goal 1	NCAC	Needs to define reliable and secure and user consumption must be included. Also, water demand management should be recognized.	See policies and IS's under goals 2 and 4.

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10.5 Goal 1	HBA	Goal should address multiple water sources.	Policies under this goal address priority for water development including efficiency, conservation and use of reclaimed water.
10.5 Policy 1.1	LOCAC	Add wording to protect existing supplies.	Revise to state: "...to protect existing and secure new water supplies.
10.5-6 IS 1.1.1	LOCAC	Re-order c, d, b, a, e	The existing order will suffice for this program.
10.5 IS 1.1.1	LOCAC	Revise "Evaluate the potential for new supplies." And change "Evaluate" to "Create"	The program will analyze supply and demand and will evaluate a demand model.
10.6 Policy 1.2	NCAC	Opposition to expand desalination opportunities.	Noted. Desalination is the last water source in the hierarchy.
10.6 Policy 1.2	NCAC	Policy WR 1.2 contradicts WR 1.1 and other resource sections. Suggests changing location of this policy. Also, suggested wording change in regard to desalinization.	See revised policies in the current Public Hearing Draft.
10.6 Policy 1.3	LOCAC	Add: " Analyze New Water Supply Sources " Add: " ...and alternative uses of our existing resources "	Policy heading and policy language are adequate.
10.6 IS 1.2.3	NCAC	What is meant by partner in regard to desalinization projects?	Partners can include other jurisdictions through direct system connection or through water wheeling agreements.
10.6 Policy 1.4	B.K. Richards	This is a goal, not a policy.	The policy contains a numerical goal; however, we include it as a policy under a larger goal of a reliable regional supply.
10.6 Policy 1.4	Farm Bureau	Rewrite to state that all requirements must be met in order to use reclaimed water on agricultural lands.	Compliance with reclaimed water quality standards must be met.
10.7 IS 1.4.3	Farm Bureau	Remove agriculture from the list of potential partners for tertiary treated water.	Agriculture remains a potential partner under the right circumstances.
10.7 IS 1.4.4	Farm Bureau	Revise to cite "landscape irrigation" instead of "irrigation" in general.	The IS should include many opportunities to use reclaimed water.
10.7 Policy 1.5/6	LOCAC	Revise Policy titles	Titles accurately reflect the policy subject.
10.7 Policy 1.6	NCAC	Policy WR 1.6 In regard to groundwater management and ag zoned and non ag zoned areas makes no sense. Also, is groundwater management a county responsibility?	This is an important concept in water resources. Groundwater management is a County responsibility.
10.7 IS 1.6.2/3	LOCAC	Add IS to participate in plans to protect ecosystems and IS to revise IRWM as needed.	Ecosystem protections are found in the Biological Resources Chapter.
10.7 Policy 1.7	Farm Bureau	This should be in the Agriculture Element not in the COSE.	The policy and IS are complimentary to AG policy 11.
10.8 IS 1.7.2	LOCAC	Add IS to encourage ag water conservation.	See Goal 2 and Ag Element.

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10.8 Policy 1.9	LOCAC	Add word..... only when water is available"	Existing language is adequate.
10.8 Policy 1.11	B.K. Richards	This is a goal, not a policy.	The policy contains goal wording but is included as a policy under a larger goal heading of a secure water supply.
10.8 IS 1.11.2	NCAC	WR 1.11.2 in regard to density in groundwater basins appears to only add levels of complexity, additional cost and work without any measurable added benefit.	WSA's are an effective means to identify available water supplies.
10.10 Policy 1.13	NCAC	Need an implementation strategy in regard to non agricultural water use in groundwater basins with level of severity II or III.	The policy is self implementing and refers to RMS.
10.8-12 Policies 1.10/12/ 14/2.1	LOCAC	Revise policy titles to add action ie. Control Use of Water Wheeling.	Existing language accurately reflects the policy subject.
10.10 Policies 1.13/14	B.K. Richards	LOS criteria should be based on climate change threat.	RMS process will assess climate change threats to groundwater.
10.11 Policy 1.14	LOCAC	Add an IS to require a water analysis.	See IS 1.12.2.
10.11 Policy 1.15	Sierra Club	Suggest: Support the expansion of desalination opportunities (IRWM) <u>after first exhausting all water efficiency measures, the use of recycled and reclaimed water technologies, interagency cooperative projects, Low Impact Development and groundwater recharge projects to meet water supply needs (WR 1.3).</u>	Partially agree. Policy 1.3 addresses development of new water supplies with desal last. Revise Policy 1.15: "Support the expansion of desalination opportunities when other new water sources are not available (e.g. increased efficiency and conservation, taking full allotments of existing surface water projects such as the Nacimientos Water Project).
10.11 Policy 1.15	LOCAC	Analyze desal impacts on ecosystems.	See Policy 1.15 language.
10.11 Goal 2	NCAC	A county ordinance would add little benefit in regard to groundwater management.	A groundwater management ordinance would have tremendous benefit to the water resources of the county.
10.12 Policy 2.2	B.K. Richards	Is there a standard monitoring frequency, format, etc... Data collection and reporting should be mandatory activities.	RMS and the Public Work's Dept well measurement programs have detailed requirements (e.g. monthly readings of water used, twice a year well measurements).
10.12 Policy 2.2	LOCAC	Add purpose statement for support of monitoring.	See IS 2.2.3 and 2.2.4.
10.12 IS 2.2.2	Farm Bureau	Revise to include voluntary nature and mention confidentiality of water information.	IS 2.2.2 has been in effect for 34 years. There does not appear to have been problems with this language.
10.13 IS 2.2.5	B.K. Richards	Any land use permit should be subject to monitoring and reporting.	This would represent too much data that might not be needed (e.g. each rural household pumping probably is not needed) and thus impose additional cost to property owners.

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10.12 IS 2.3.1	LOCAC	Add agricultural and private wells.	All wells is assumed in the IS.
10.13 Policy 2.4	RCD	Add and IS requiring LID in all new development; plumb for graywater; protect watersheds.	See IS 4.7.1 and Policy 4.6 regarding LID and graywater.
10.13 Policy 2.5	Ag. Dept.	Revise to require study of possible groundwater banking impacts, especially on ag lands.	Impacts in all areas will be studied prior to implementation of a groundwater banking program.
10.13 Policy 2.5	Farm Bureau	Add clears direction to study legal ramifications of banking programs.	All legal ramifications of the program will be studied.
10.14 Map	B.K. Richards	Maps are of limited use.	The maps are for display purposes.
10.16 Policy 3.1	LOCAC	Add IS to address education program	See IS 3.1.4
10.16 IS 3.1.2	B.K. Richards	BMP seems gratuitous	BMP's are important as they are already developed and widely used.
10.17 Policy 3.2	B.K. Richards	"Point and non-point " is unnecessary. Radionuclide(s) (add "s")	Noted. Revise to read: "radionuclides"
10.17 Policy 3.3	LOCAC	1) Add to list of pollutants in policy and 2) add IS to educate staff and public regarding new contaminants and 3) add IS to prevent use of biosolids on open space lands.	1) The list is not meant to be exhaustive; 2) New areas of concern are addressed regardless of the listed contaminants; 3) see Open Space chapter.
10.17- 10.28 Policy Titles	LOCAC	Add wording to various policy titles.	Existing language accurately reflects the policy subject.
10.18 Policy 3.5	Ag. Dept.	Policy should reference AGP 9.	Agree. This has been noted in this draft.
10.18 Picture	B.K. Richards	Whale Rock picture is not cited.	The originator is unknown.
10.18 Policy 3.6	Ag. Dept.	Policy should reference AGP 10.	The two policies address separate issues (water conservation and water quality).
10.19 Goal 4	NCAC	Contradiction between Cambria's water master plan and Goal WR 4 declining potable water use. Also, will this be an additional 20% reduction to communities already facing restrictions?	The policies are written to take each community or water use sector's circumstances into account.
10.19 Policy 4.1	B.K. Richards	Policy 4.1 is written as a goal.	The policy contains goal wording but is included as a policy for implementation purposes.
10.19 IS 4.1.2	Sierra Club	Require the use of certain water efficiencies as part of a countywide water conservation ordinance.	The IS does not have to include the list of efficiencies.
10.19 IS 4.1.2	HBA	IS 4.1.2 to adopt a countywide water conservation ordinance should be broad based. Conservation must target	Agree. The IS does target existing development.

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		current users.	
10.19 IS 4.1.3	NCAC	IS WR 4.1.3 repeats policy WR 1.4.	One IS speaks to a countywide water conservation program and the other addresses reclaimed water.
10.19 IS 4.1.5	Sierra Club	Suggest adding IS 4.1.5: <u>Encourage partnerships with and financial support from energy utilities and wastewater agencies</u>	Other IS's will generally address this issue.
10.20 IS 4.2.1	HBA	Tiered water rates should be standard.	Policies have been proposed to address tiered water rates.
10.20 Policy 4.3	NCAC	Being a leader in water conservation suggests offering specific strategies to other government agencies.	See policies under goals 2 and 4 and 5.
10.21 IS 4.6.1	NCAC	In regard to water reuse methods in new development addresses only grey water and should include cooperation with other agencies and incentives.	See revised Public Hearing Draft (PHD).
10.22 Policy 5.1	B.K. Richards	Discuss distinction between a watershed management plan and a groundwater management plan.	The distinction is probably beyond what is needed to be described in this chapter.
10.22 Policy 5.1	HBA	The County should join other local governments to work on watershed management issues thru the Stormwater TAC.	The County is a member of the stormwater management TAC.
10.23 IS 5.1.3	Ag. Dept.	Clarify IS WR 5.1.3 and Ag dept. role in implementation.	The Ag Dept is mentioned in the implementation of AG policies AG 15 and 16 cited in WR 5.1.3.
10.23 Policy 5.2	NCAC	In regard to climate change suggest word change other than "consider". Also, need IS for this policy.	See revised PHD.
10.23 Policy 5.2	NCAC	Regarding wording of county research on climate change and consider an implementation strategy.	See revised PHD.
10.24 Goal 6	NCAC	Goal 6 in regard to flood control has no mention of sea level rise threats from climate change.	See AQ Goal 5.
10.26 IS Table	Public Works	IS 1.6.1: Add Planning and Building Department	Table will be revised to add Dept.
10.27 Policy 6.2	B.K. Richards	Change "should" to "will"	Source document is the IRWM where such language is used.
10.27 Policy 6.4	B.K. Richards	Change to "must" from "should".	Should is adequate in this case.
10.31 IS Table	Public Works	IS 4.1.3: Add Environmental Health	Table will be revised to add EH.